REMARKS

Claims 6 and 13 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicants have amended these claims to address the issue noted by the Examiner.

Claims 1-14 were rejected under 35 U.S.C. 102(e) as being anticipated by Coombs. Claims 15-42 were rejected under 35 U.S.C. 103(a) as being unpatentable over Coombs in view of Mazur. Claims 43-46 were rejected under 35 U.S.C. 103(a) as being unpatentable over Coombs.

Claims 1 and 8 have been amended to emphasize that a comparison is made of the responses from each illumination against each other, and the determination of a characteristic of the document (such as authenticity, claims 4 and 11) is based on comparison differences or similarities with respect to illumination response to the at least two wavelengths of light. Claims 15 and 29 already claim sensing two responses and making the authentication determination based on a comparison between those two responses. Claims 43 and 45 claim sensing two reflected light responses, comparing those two responses against each other and making a counterfeit detection if the comparison of the two response shows that they are not substantially the same.

Thus, each of the pending independent claims includes a limitation directed to the comparison of two illumination responses, for a given document, against each other with a determination for that document being made based on that comparison. Applicants respectfully submit that this claim feature is neither disclosed nor suggested by Coombs.

In support of the rejection of claims 15-42 and 43-46, the Examiner asserted that Coombs taught making an authentication determination for each currency bill based on a comparison between a first and second response. In support of this assertion, the Examiner cited to Coombs Figure 11 and col. 5, lines 12-20 and col. 16, line 21 to col. 17, line 65. Applicants respectfully submit that the Examiner has misread the teachings of Coombs.

Turning first to Coombs col. 5, lines 12-20, the teaching is for having the optical characteristics and/or spectral shift be compared with stored reference data to verify authenticity (col. 5, lines 18-20). Thus, Coombs clearly teaches comparison of reflected light response only against a stored reference and NOT against another reflected light response for that same document.

Turning next to Coombs Figure 11 and col. 5, lines 12-20 and col. 16, line 21 to col. 17, line 65, the teaching is for at least two light beams being directed at the document. After reflection from the document, those two reflected light beams are detected. Coombs then teaches combining the information relating to the two reflected and detected light beams together to generate "specific spectral characteristics" (col. 17, lines 9-14). It is noted here that Coombs specifically teaches **combining** the detected reflected light beam information. Combining of information is NOT the same operation as **comparing** illumination responses against each other as is claimed by Applicants.

Additionally, Applicants note that Coombs further teaches taking the specific spectral characteristics (which result from combining the information relating to the two reflected and detected light beams) and comparing the measured spectral characteristics with stored data to verify authenticity (col. 17, lines 17-20). Thus, Coombs clearly teaches comparison of reflected light response only against a stored reference and NOT against another reflected light response for that same document.

With respect to Figure 11, this figure does not teach or suggest comparing reflected and detected light responses against each other. Rather, Figure 11 illustrates the response of three detectors in the system of Figure 10 over time. What is shown in Figure 11 is that the peak response of each detector occurs at a different point in time because the detectors are spatially offset from each other along the document transport path and thus each will make a detection only when the transported document passes. Figure 11 is irrelevant to the claimed comparison operation which is used to make document characteristic (claims 1 and 8), authentication (claims 15 and 29) or counterfeit determinations.

The Examiner has asserted that Figure 11 obviously shows a comparison of the outputs of the three reflected detections of laser light applied to the document. Even if the Examiner is correct, the only comparison shown in Figure 11 is a time-based comparison (see, x-axis of Figure 11). Applicants' claims do not broadly an recite "comparing" in the abstract or without further restriction or limitation. Additionally, Applicants do not claim offset time-based comparison. Rather, Applicants claim that the detected light responses are compared against each other for the purpose of determining a document characteristic (claims 1 and 8), making an authentication determination (claims 15 and 29) or finding a counterfeit (claims 43 and 45). The Figure 11 illustration showing times when a reflection response is detected does not provide any information concerning a document characteristic, whether the document is authentic or whether the document is a counterfeit. Coombs fails to provide any teaching for how the graph of Figure 11 could be used, and it is not clear from the disclosure that Figure 11 is actually generated by the system of Figure 10 (Coombs simply refers to Figure 11 as a "graphical representation" and the only mention of Figure 11 is at col. 17, lines 13-17). With respect to Figure 11, Coombs is more particularly describing the operation of the system illustrated in Figure 10 which clearly does not generate or use Figure 11 to make an authenticity determination, but rather combines offset in time detector outputs together and makes a comparison against stored data to determine authenticity (col. 17, lines 18-22). The only thing a comparison of the responses shown in Figure 11 will show is that the responses were collected with a time variance due to the linear arrangement of the detectors in Figure 10. No document characteristic (claims 1 and 8), authentication (claims 15 and 29) or counterfeit determinations can be made from Figure 11, and Coombs does not make any suggestion that Figure 11 is material to the authentication process.

In summary, Coombs teaches making comparisons only between a detected light response and a stored reference. There is no teaching or suggestion for "comparing the responses from each illumination against each other" as recited in claims 1 and 8. There is no teaching or suggestion for a "comparison between the first response and the second response" as recited in claim 15 and 29. There is no teaching or suggestion for "comparing the first and second reflected light responses" as recited in claims 43 and 45. These claims are accordingly patentable over Coombs.

Allowance of the application is respectfully requested.

Respectfully submitted,

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